

RJK/bz

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	<b>CHAPTER 13</b>
ROBIN L. CAMPBELL,	:	
a/k/a ROBIN LOUISE CAMPBELL,	:	<b>CASE NO.: 23-12584</b>
a/k/a ROBIN CAMPBELL, and	:	
a/k/a THOMAS M. CAMPBELL,	:	
a/k/a THOMAS MICHAEL CAMPBELL,	:	
a/k/a THOMAS CAMPBELL,	:	
Debtor(s)	:	

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**MOTION TO MODIFY CONFIRMED PLAN**

AND NOW COMES DEBTORS, **Robin L. Campbell and Thomas M. Campbell**, by and through their attorneys, Newman Williams, P.C., with **Motion to Modify Confirmed Plan** and in support thereof aver:

1. Debtors' First Amended Chapter 13 Plan was confirmed on January 25, 2024.
2. Debtors desire to amend Debtors' Chapter 13 Plan in order to provide for the payment of post-petition auto loan arrears to AmeriCredit Financial Services, Inc. / GM Financial in accordance with a Stipulation filed with the Court on April 23, 2024.
3. By reason of the foregoing, Debtors propose that pursuant to Section 1329(a) of the Bankruptcy Code, Debtors' Chapter 13 Plan be modified as set forth in the Second Amended Chapter 13 Plan in conjunction with this Motion.

WHEREFORE, Debtors, **Robin L. Campbell and Thomas M. Campbell**, pray this Honorable Court for an Order that GRANTS the instant Motion to Modify Confirmed Plan, MODIFIES the confirmed Chapter 13 Plan, and APPROVES the **Second** Amended Chapter 13 Plan as the confirmed Chapter 13 Plan, as modified, and for such other and further relief as the Honorable Court deems just and appropriate.

Dated: May 01, 2024

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq.  
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